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April 18, 2023

Via ECF

Hon. Laura Taylor Swain
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Constantinescu, et al., 19-cr-651 (LTS)

Your Honor:

I am counsel to Iuliana Mihailescu, a defendant in the above reference case. I write to request a one-time bail modification to permit Ms. Mihailescu to travel to Pennsylvania on April 29, 2023.

Ms. Mihailescu would like to travel with her church, St. Nicholas in Sunnyside, Queens, on a one-day pilgrimage to St. George Church in Taylor, PA. After the morning liturgy at the church, the group will visit the Protection Monastery in White Haven, PA. The group will be traveling by bus, departing at 8am and returning at 9pm.

Pre-Trial Services Officer Dominique Jackson takes no position as long as approval is given, and the government has told defense counsel that it defers to Pre-Trial.

Accordingly, we respectfully request that the Court modify Ms. Mihailescu's current bail conditions to permit her to travel to Pennsylvania on April 29, 2023.

I thank the Court for its attention to this matter.

The requested modification is granted.
SO ORDERED.

4/18/2023
/s/ Laura Taylor Swain, Chief USDJ

Respectfully submitted,

/s/

Dawn M. Cardi

cc: All Parties (via ECF)